

**UNITED STATES DISTRICT COURT  
FOR THE SOUTHERN DISTRICT OF OHIO**

<b>OHIOANS AGAINST CORPORATE BAILOUTS, LLC, <i>et al</i>,</b>	:	<b>Case No. 2:19-CV-4466</b>
	:	
<b>Plaintiffs,</b>	:	<b>Judge Sargus</b>
	:	
<b>v.</b>	:	
	:	
<b>FRANK LAROSE, <i>et al</i>,</b>	:	
	:	
<b>Defendants.</b>	:	

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**DECLARATION OF KELLI GARCIA**

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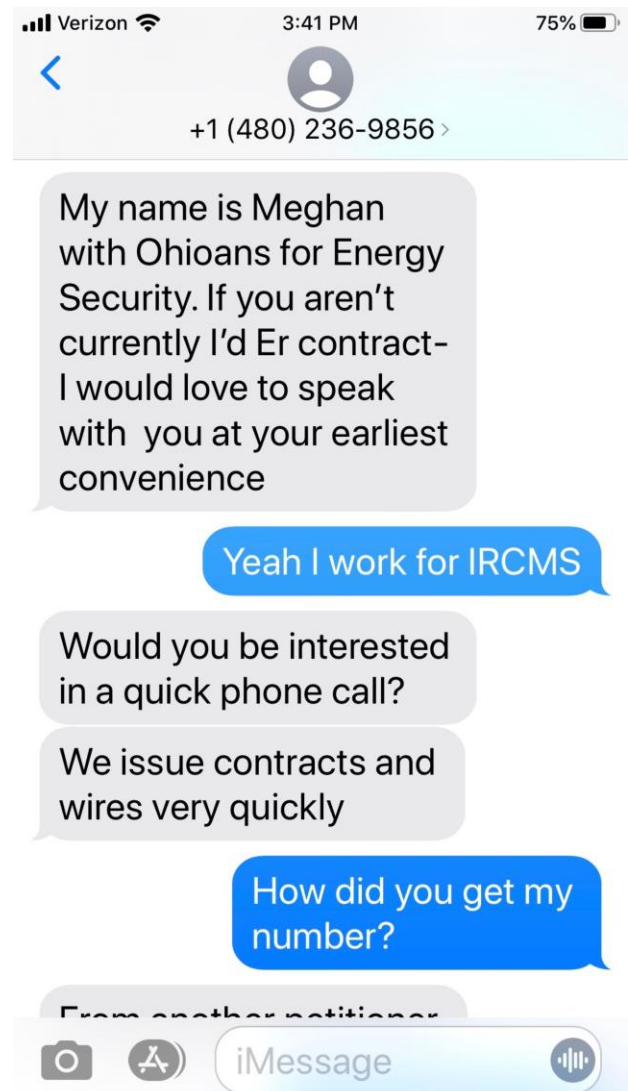
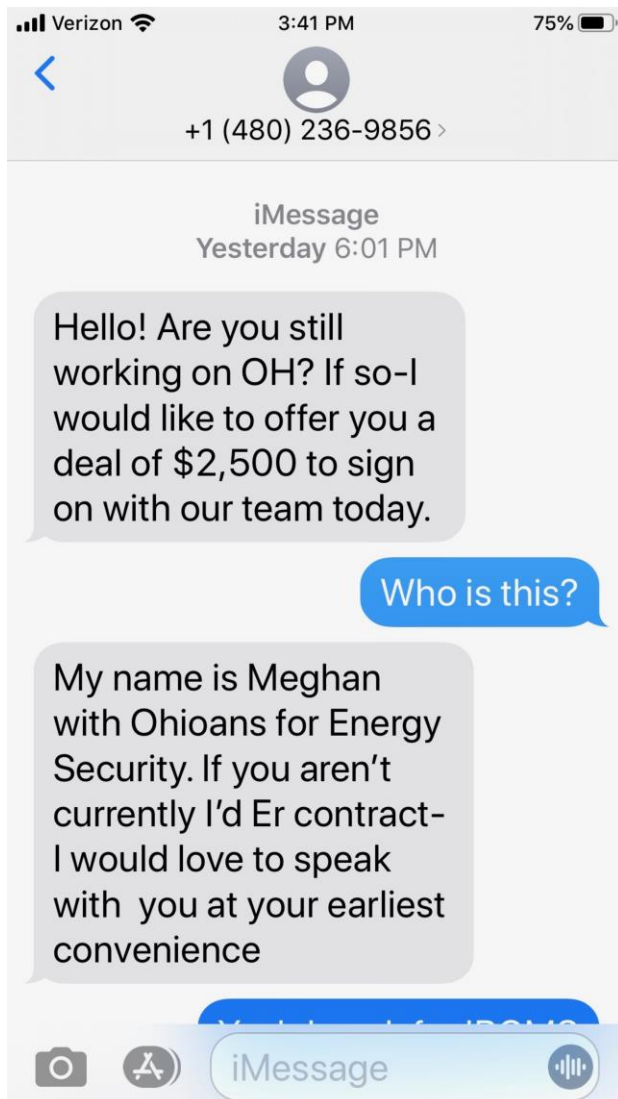
Pursuant to 28 U.S.C. § 1746, I, **KELLI GARCIA**, hereby declare as follows:

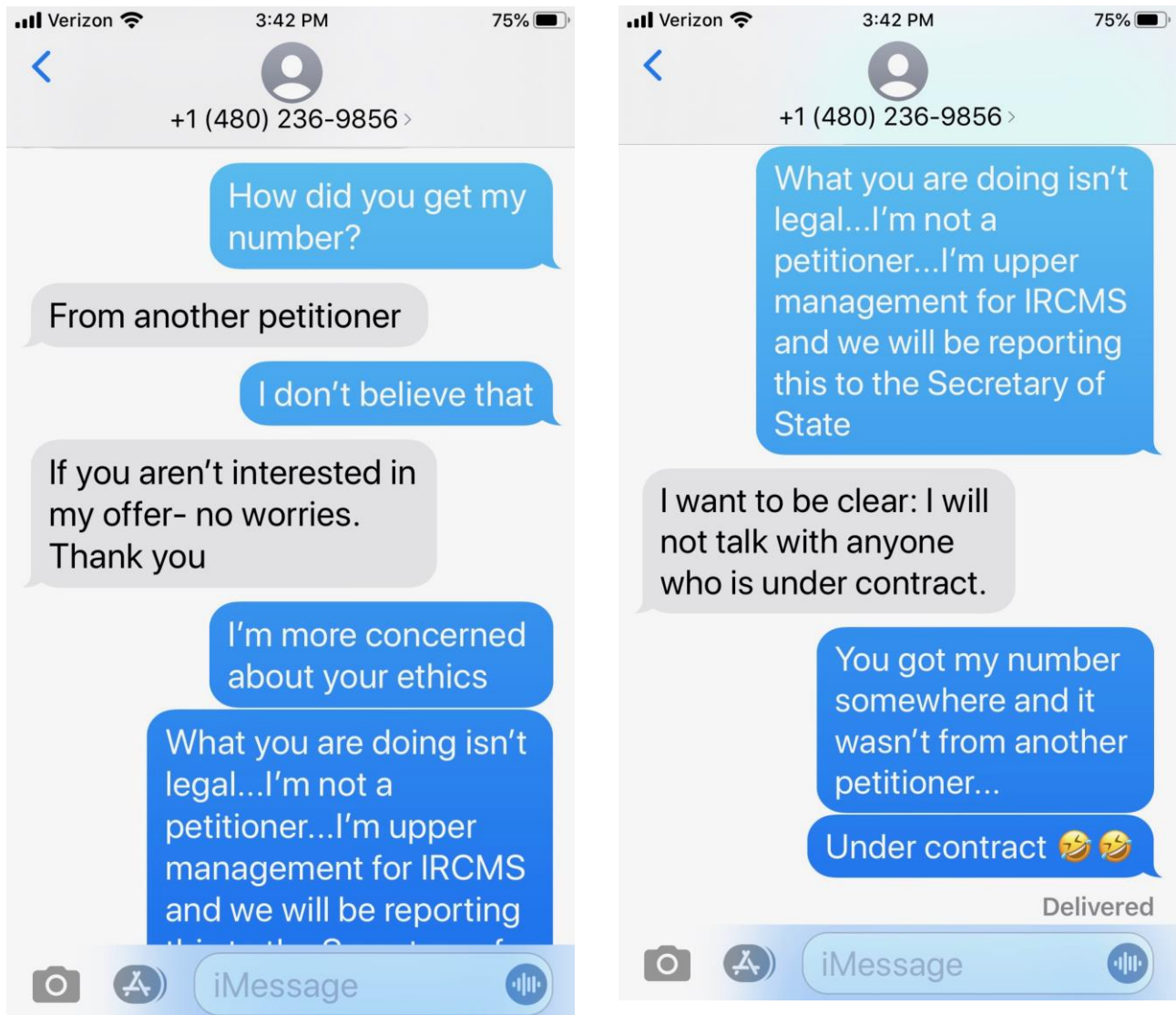
1. I am over 18 years of age and have personal knowledge of the facts stated herein.
2. Currently, I am involved in the effort in Ohio to circulate petitions in order to subject portions of H.B. 6 to referendum, employed by Initiative and Referendum Campaign Management Services (“IRCMS”).
3. Generally speaking, Initiative and Referendum Campaign Management has been engaged to manage the signature gathering efforts in Ohio in order to subject portions of H.B. 6 to referendum.
4. Prior to engaging in any effort in Ohio to circulate petitions in order to subject portions of H.B. 6 to referendum, I completed an Ohio Secretary of State Form 15.
5. On the Form 15, I disclosed not only my name but my cell phone number.
6. On October 8, 2019, I received an unsolicited text message on my cell phone from the phone number indicated as (480) 236-9856 and the person identifying herself as Meghan with

Ohioans for Energy Security, and immediately offering me \$2,500 to sign up with their unidentified team.

7. I briefly engaged in a text exchange on my phone with the person identifying herself as Meghan.

8. A true and accurate copy of the text exchange taken by screen shots of my phone follows:



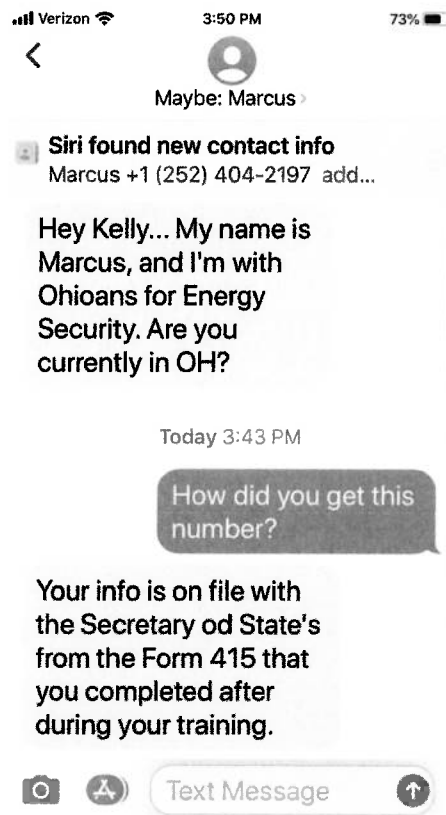


9. Within the text messages, Meghan claimed that she received my cell phone number from “another petitioner”. However, the petitioners who work with IRCMS do not have my personal cell phone number. The only place I have publicly published or disseminated my name together with my cell phone number related to the on-going petition effort in Ohio has been on the Form 15 which was filed with the Ohio Secretary of State. Thus, contrary to the indication of Meghan in her text that she received my cell phone number from a petitioner, it is reasonably

likely that the only place she could have obtained my cell phone number would be from the Form 15.

10. The next morning, *i.e.*, on October 9, 2019, I received another unsolicited text message on my cell phone from the phone number indicated as (252) 404-2197 and the person identifying himself as Marcus with Ohioans for Energy Security.

11. I responded to Marcus' text message asking how he got my phone number. He confirmed that he and Ohioans for Energy Security had obtained in from the Form 15. A true and accurate copy of this text exchange taken by a screen shot of my phone follows:



I declare under penalty of perjury that the foregoing is true and correct.

Executed this 10th day of October 2019.

Kelly Garcia